

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

US GHOST ADVENTURES, LLC,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. <u>1:23-cv-12116</u>
)	
MISS LIZZIE’S COFFEE LLC,)	
)	
)	
and)	
)	
JOSEPH PEREIRA, individually,)	
)	
Defendants.)	
)	

OPPOSITION TO MOTION TO DISMISS

Plaintiff, US Ghost Adventures, LLC (“Plaintiff”), by and through its undersigned counsel hereby states as follows in opposition to the Motion to Dismiss filed by Defendant, Joseph Pereira:

On June 3, 2025, Plaintiff filed its Motion for Entry of Default Against Miss Lizzie’s Coffee, LLC (Dkt. 63).

On June 17, 2025, Plaintiff filed its Motion to Compel seeking responses to its first set of interrogatories and requests for production from defendant, Joseph Pereira.

On July 3, 2025, Joseph Pereira moved this Court for an extension of time to retain counsel to August 7, 2025.

On July 7, 2025, this Court granted said Motion for an Extension of time and ordered that successor counsel for Miss Lizzie’s Coffee, LLC make an appearance by August 7, 2025.

This Court further ordered that Joseph Pereira show cause by August 7, 2025 why the Court should not award Plaintiff fees and costs for failing to respond to Plaintiff’s first set of interrogatories and requests for production.

On August 11, 2025, Joseph Pereira filed a Motion to Dismiss. Said Motion is wholly improper and confirms that Miss Lizzie's Coffee, LLC has no intent to retain counsel, nor does Joseph Pereira have any intent to respond to the outstanding discovery requests.

WHEREFORE, Plaintiff respectfully requests that the Motion to Dismiss be denied, default be entered against Miss Lizzie's Coffee, LLC and that the Court award the fees and costs incurred in reference to Plaintiff's Motion to Compel in the amount of \$887.00 as set forth in the attached Declarations and corollary exhibits.

Dated: August 15, 2025

Respectfully Submitted,

Plaintiff
US GHOST ADVENTURES LLC

By its attorneys,

/s/ Mikaela R. DeCortin
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those parties which are non-registered participants.

Date: August 15, 2025

/s/ Mikaela R. DeCortin
Mikaela R. DeCortin